

Toby S. Soli Tel 212-801-3196 Fax 212-801-6400 solit@gtlaw.com

April 12, 2019

VIA ECF

The Honorable Barbara C. Moses
United States District Court Magistrate Judge
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Lek Securities Corporation, et ano. v. Nicolas Louis, et al.,

Case No. 19-cv-02142 (RMB/BCM)

Dear Judge Moses:

I was just retained and entered my appearance on behalf of Defendants Volant Holding, LLC d/b/a Volant Trading, Volant Trading, LLC, Volant Liquidity, LLC, and Volant Execution, LLC (the "Volant Defendants") to act as lead counsel in the above-referenced case. At my request, the parties have agreed to a very short extension of a few days on certain deadlines contained in the Court's Expedited Discovery and Case Management Order dated April 5, 2019 [Dkt. # 49]. As reflected in the attached Stipulation, the parties have agreed to extend the time for Defendants to answer or otherwise respond to the complaint to Monday, April 15, 2019, and have agreed to extend the time for certain discovery responses to next Friday, April 19, 2019. These changes do not affect any of the dates or deadlines related to court conferences or court proceedings. Accordingly, the parties respectfully request that the Stipulation be So Ordered.

Respectfully submitted.

Toby S. S

cc: All counsel of record

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LEK SECURITIES CORPORATION and ROX SYSTEMS, INC.,

CASE NO.: 19-CV-02142 (RMB/BCM)

Plaintiffs,

v.

NICOLAS LOUIS, JONATHAN FOWLER, VOLANT HOLDING, LLC d/b/a VOLANT TRADING, VOLANT TRADING, LLC, VOLANT LIQUIDITY, LLC, AND VOLANT EXECUTION, LLC, **STIPULATION**

Defendants.

IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel, that certain deadlines contained in the Court's Expedited Discovery and Case Management Order dated April 5, 2019 [Dkt. # 49] be extended as follows:

- 1. <u>Joinder and Amendment</u>: Defendants' time to answer or otherwise respond to the complaint is extended from April 12, 2019 to **April 15, 2019**.
- 2. <u>Automatic Disclosures and Written Discovery Responses</u>. The deadline for the parties to respond to the below discovery is extended from April 15, 2019 to April 19, 2019:
 - a. exchange the disclosure required by Fed. R. Civ. P. 26(a)(1);
 - b. serve all remaining objections and responses to each other's previously-served written discovery requests;
 - c. produce all responsive documents not objected to or withheld on the basis of privilege; and
 - d. serve their privilege logs in compliance with Local Civil Rule 26.2.

3. All other deadlines in the Order will remain the s	came
---	------

TATEN	TTA	TO	TIC	TT	D
DEN	וכטוו	CV	U.S	1 /	. P

By: /s/ Brian S. Cousin
Brian S. Cousin
Mark D. Meredith
Christina S. Dumitrescu
1221 Avenue of the Americas
New York, New York 10025
(212) 768-6700
brian.cousin@dentons.com
mark.meredith@dentons.com
christina.dumitrescu@dentons.com

-and-

Paul D Sarkozi
Carl F. Regelmann
TANNENBAUM HELPERN SYRACUSE
& HIRSCHTRITT LLP
900 Third Avenue
New York, New York 10022
(212) 508-6700
sarkozi@thsh.com
regelmann@thsh.com

Attorneys for Plaintiffs

GREENBERG TRARUG, LLP

By: /s/ Toby S. Soli
Toby S. Soli
200 Park Avenue
New York, New York 10166
(212) 801-9200
solit@gtlaw.com

-and-

Howard Schiffman SCHULTE ROTH & ZABEL LLP 919 Third Avenue New York, New York 10022 (212) 756-2000 howard.schiffman@srz.com

Attorneys for Volant Defendants

FORD O'BRIEN LLP

By: /s/ Robert S. Landy
Robert S. Landy
575 Fifth Avenue
17th Floor
New York, New York 10017
rlandy@fordobrien.com

Attorenys for Defendants Nicolas Louis and Jonathan Fowler

Dated: April ____, 2019 New York, New York

SO ORDERED:

Hon. Barbara Moses, USMJ